

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
(EASTERN DIVISION)**

ARTHUR E. LANDRY, individually and)	
on behalf of all other persons similarly)	CIVIL NO. <u>1:09-CV-11012-RWZ</u>
situated,)	
)	
PLAINTIFFS,)	
)	
v.)	
)	
PETER PAN BUS LINES, INC.,)	
)	
DEFENDANTS.)	Date: <u>September 9, 2009</u>

AFFIDAVIT OF BRIAN STEFANO

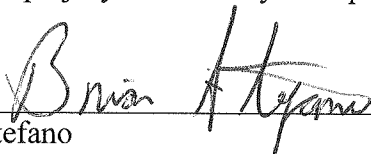
I, Brian Stefano, being duly sworn depose and say the following upon personal knowledge and belief:

1. My name is Brian Stefano and I am the Executive Vice President / Chief Operating & Financial Officer for Peter Pan Bus Lines, Inc. located in Springfield, Massachusetts.
2. As the Executive Vice President / Chief Operating & Financial Officer for Peter Pan Bus Lines, Inc., I am a duly authorized representative of Peter Pan Bus Lines, Inc. and I possess the legal authority to make this Affidavit on behalf of myself and on behalf of Peter Pan Bus Lines, Inc.
3. Peter Pan Bus Lines, Inc. is a privately held corporation organized under the laws of the Commonwealth of Massachusetts.
4. In 2003, Peter Pan Bus Lines, Inc. purchased the following small bus companies owned and operated in the Northeast region of the United States from another bus company named Coach USA: Arrow Line, Mini Coach of Boston, Maine Line, Pawtuxet Valley, and the Providence-based Bonanza. This was an asset purchase of these companies by Peter Pan, which resulted in the severing of their relationship with Coach USA.
5. To the best of my knowledge, understanding and belief, Coach USA is a limited liability company owned by the Scottish transportation company named Stagecoach Group.
6. Peter Pan Bus Lines, Inc. is not and has never been an owner, parent, subsidiary, affiliate, or other type of related entity to Coach USA or Orange, Newark, Elizabeth

Bus, Inc., or to any of its or their subsidiaries that operate out of New Jersey that were identified in *Ingram v. Coach USA, Inc.*, No. 06-3425, 2008 WL 281224 (D.N.J. Jan 28, 2008), namely, Olympia Trails, ONE Bus, Inc., Red & Tan, or Independent Bus. Peter Pan's involvement with Coach USA was and has always been limited to Peter Pan's asset purchase of the companies referenced in Paragraph 4, above, from Coach USA in 2003.

7. Peter Pan did not purchase or otherwise acquire, nor does it have any interest in Coach USA's operations in New Jersey.
8. Peter Pan Bus Lines was not involved in and has never been involved in the Fair Labor Standards Act case entitled *Ingram v. Coach USA, Inc.*, No. 06-3425, 2008 WL 281224 (D.N.J. Jan 28, 2008).
9. Peter Pan has never worked with or been associated with Attorney Mark E. Tabakman, attorney for the defendants in defense in *Ingram v. Coach USA, Inc.*, No. 06-3425, 2008 WL 281224 (D.N.J. Jan 28, 2008).

Signed under the pains and penalties of perjury this 9th day of September 2009.



Brian Stefano

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

September 9, 2009

On this 9th day of September 2009, before me, the undersigned notary republic, personally appeared **Brian Stefano**. Proved to me through satisfactory evidence of identification, to be the person whose name is signed on this document, and who affirmed to me that the contents of this document are truthful and accurate to the best of her knowledge and belief.


Signature of Notary Public

DEBORAH A. WULLER
Name of Notary printed, typed or stamped

Notary Public State of: _____
My Commission Expires: _____

